

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF INDIANA INDIANAPOLIS DIVISION**

COURTNEY JEANETTE

Plaintiff,

V.

**MID AMERICA HEALTH, INC.,
PREVMED, INC.**

Defendants.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

) CAUSE NO. 1:20-cv-2467

COMPLAINT

Plaintiff, Courtney Jeanette, by counsel, hereby brings her Complaint against the Defendants, Mid America Health, Inc., (“Mid America”) and PrevMED, Inc. (“PrevMED”), and in support thereof states:

1. Plaintiff was the Operations Manager at the Defendants' workplace. Plaintiff resides at 796 MacAlpin Street, Greenwood, Indiana 46143.

2. Defendant, Mid America is an Indiana corporation located at 1499 Windhorst Way STE 120, Greenwood, Indiana.

3. Defendant, PrevMED is an Indiana corporation located at 1499 Windhorst Way
STE 120, Greenwood, Indiana.

JURISDICTION AND VENUE

4. This case presents issues under Title VII of the Civil Rights Act of 1964, as amended, 42 USC 2000e, and thus invokes the federal question jurisdiction of this Court.

5. Venue is appropriate in that the dispute takes place in this judicial district.

BACKGROUND

6. On May 11, 2015, Plaintiff was jointly employed by the Defendants as an Operations Manager.

7. Defendants employed Elliott Singer as Chief Operations Officer.

8. I was required to report to Mr. Singer.

9. Mr. Singer made outrageous comments such as “Did your husband buy your vehicle? I would never let my wife do that.” “You go to bars alone? My wife would not be allowed by me to do that.” “Don’t be emotional, you women generalize everything.” “Man, everyone is mad around here. Must be that time of the month.” and “Modest is hottest” referring to women’s clothing.

10. On January 23, 2019, Plaintiff reported these sexist comments to Kim Mosby, the HR Director.

11. Mr. Mosby responded to Mr. Singer’s sexist and discriminator behavior by slapping his palm against the back of his head and commenting “You cannot say these things!”

12. However, Mr. Mosby failed to take further action. Mr. Mosby did not conduct any investigation of my complaints.

13. On February 14, 2019, several other employees and I complaining to Rachele Gaudin in Defendants’ Human Resources Department regarding Mr. Singer’s statements and actions.

14. Again, nothing was done to fix the situation, or deter Mr. Singer’s behavior.

15. On February 19, 2019, while traveling to Chicago with Mr. Singer and another male executive, Mr. Singer relentlessly pressured me to ride in the car with him. I knew that if rode with him he would continually make sexist comments to me, so I refused. Mr. Singer

appeared very agitated at my refusal and repeatedly called my phone throughout the entire three or more hour drive, which I considered harassment.

16. During March of 2019, both Kim Mosby and Keith Walls assured me that I would not be fired, stating that I was an excellent employee. This assurance was further echoed by owner, Patrick Murphy.

17. Yet, on April 15, 2019, Mr. Mosby came into my office and said, “You are not happy here are you?” I responded by asking if I was being fired, to which Mr. Mosby said, “No, I am letting you go, even though you have never given me any problem. Your boss [Elliot] just doesn’t want to work with you.”

18. Plaintiff was discriminated against by Mr. Singer based on her sex and was then fired in retaliation for exercising her protected rights. Mr. Singer not only made Plaintiff feel uncomfortable at her job but ultimately fired her, and as a result of this Plaintiff has suffered lost wages and emotional distress.

19. Many other female employees and executives at PrevMed and Mid America also contend that they were discriminated and retaliated against for reporting Mr. Singer’s inappropriate behavior. We contend that PrevMed and Mid America is a sexist workplace. Plaintiff willing to be a class representative for all female employees who contend that PrevMed and Mid America has discriminated and retaliated against them due to their gender.

TITLE VII VIOLATION AND RETALIATION

20. Plaintiff incorporates all prior paragraphs.

21. Defendants discriminated against Plaintiff due to her gender, female, in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 USC 2000e.

22. Defendants retaliated against Plaintiff due to her complaints of gender discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 USC 2000e.

23. Plaintiff has suffered substantial damages as a result of Defendant's illegal conduct.

24. Defendants' actions have been outrageous and illegal, entitling Plaintiff to compensatory, liquidated and punitive damages, as well as attorney fees and costs of this action.

25. Plaintiff timely filed an EEOC charge and has been issued a Right to Sue by the EEOC within the past 90 days, and thus, has fulfilled all administrative requirements prior to filing this lawsuit.

WHEREFORE, Plaintiff, Courtney Jeanette, by counsel, seeks a judgment against Defendants, Mid America Health, Inc., and PrevMED, Inc. for money damages, backpay, front pay, liquidated damages, compensatory damages, punitive damages, attorney fees costs, interest and all other appropriate relief.

Respectfully submitted,
/s/ Mark Waterfill
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JURY DEMAND

Plaintiff demands a trial by jury.

/s/ Mark Waterfill

